

1 WILLIAM BLUMENTHAL  
General Counsel

2 JANICE L. CHARTER Colo. Bar No. 12750  
3 DAVID M. NEWMAN Cal. Bar No. 54218  
4 THOMAS DAHDOUH N.Y. Bar No. 2222370  
Federal Trade Commission  
901 Market Street, Suite 570  
5 San Francisco, CA 94103  
Phone (415) 848-5100/ Fax (415) 848-5184  
6 jcharter@ftc.gov; dnewman@ftc.gov; tdahdouh@ftc.gov

7 ATTORNEYS FOR PLAINTIFF  
FEDERAL TRADE COMMISSION

8  
9 **UNITED STATES DISTRICT COURT**  
10 **NORTHERN DISTRICT OF CALIFORNIA**  
11 **SAN FRANCISCO DIVISION**

12 FEDERAL TRADE COMMISSION,

13 Plaintiff,

14 v.

15 NEXTCLICKMEDIA, LLC, *et al.*,

16 Defendants.

Case No. C08-1718-VRW

STIPULATION FOR ORDER  
EXTENDING DEADLINE FOR FILING  
RESPONSIVE PLEADINGS AND  
~~PROPOSED~~ ORDER

17  
18  
19  
20 WHEREAS, Defendants NextClickMedia, LLC's, Next Internet, LLC's, Kenneth  
21 Chan's and Albert Chen's (collectively, "Defendants") response to Plaintiff Federal Trade  
22 Commission's (the "FTC") Complaint is currently due on Monday, December 1, 2008;

23 WHEREAS, the parties to this action have continued to exchange information and  
24 proposed settlement provisions with the intention of exploring the possibility of settlement of  
25 this matter;

26 WHEREAS, the FTC is willing to extend the time for Defendants to file their responses  
27 to Plaintiff's Complaint in order to focus on settlement discussions; and

28 WHEREAS the parties believe that additional time will increase the likelihood that they

will be able to reach a settlement of this matter;

NOW, THEREFORE, IT IS HEREBY STIPULATED by and between the FTC and Defendants, through their respective counsel, that Defendants' time to move, answer or otherwise respond to the Complaint shall be and hereby is extended to and including February 2, 2009; and

IT IS FURTHER STIPULATED that the Case Management Conference, currently scheduled for January 22, 2009, at 3:30 p.m., be rescheduled to March 26, 2009, at 3:30 p.m., and that the date for filing the Case Management Statement be extended to March 16, 2009.

Dated: 11/21/08

/s/

MICHAEL C. LYNCH  
KELLEY DRYE & WARREN, LLP  
ATTORNEY FOR DEFENDANTS

Dated: 11/21/08

/s/

JANICE L. CHARTER  
DAVID M. NEWMAN  
THOMAS N. DAHDYOUH  
ATTORNEYS FOR PLAINTIFF

### ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: 12/1/2008

\_\_\_\_\_  
VAUGHN R. WALKER  
UNITED STATES DISTRICT COURT JUDGE

